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 9 **Attorney for Secured Creditor**

Wells Fargo Bank, N.A.  
 09-70384

UNITED STATES BANKRUPTCY COURT  
 DISTRICT OF NEVADA

<p>10 In re:</p> <p>11</p> <p>12 Paul David Bowers and Mary Diane Bowers</p> <p>13</p> <p>14</p> <p>15 Debtor(s).</p>	<p><b>Bk Case Number: 09-50014-gwz</b></p> <p>Chapter 13</p> <p>NOTICE OF MOTION FOR RELIEF FROM THE AUTOMATIC STAY HEARING DATE: 8/5/2010 HEARING TIME: 1:30 pm</p> <p>ESTIMATED TIME: 5 Minutes</p>
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16 TO THE HONORABLE GREGG W. ZIVE, THE DEBTORS, THEIR  
 17 ATTORNEY OF RECORD AND THE CHAPTER 13 TRUSTEE, AND OTHER INTERESTED  
 18 PARTIES:

19 PLEASE TAKE NOTICE that on the 5<sup>th</sup> day of August, 2010 at 1:30 pm before United States  
 20 Bankruptcy Gregg W. Zive, located at the Clifton Young Federal Building, 300 Booth Street,  
 21 Courtroom No. 1, Reno, Nevada. Wells Fargo Bank, N.A., it's assignees and/or successors in interest  
 22 and assigns ("Movant"), will move this Court, pursuant to 11 U.S.C. §362(d), for an order terminating  
 23 the automatic stay, to allow Movant to proceed with its non-bankruptcy remedies, including, but not  
 24 limited to foreclosure upon obtaining possession of and selling the subject real property located at 820  
 Glen Vista Dr., Sparks, NV 89434 (the "subject real property").

25 PLEASE TAKE FURTHER NOTICE that Local Bankruptcy Rule 9014(d)(1) requires that any  
 26 opposition to the motion must be filed and service completed upon the Movant not more that fourteen  
 (14) days after service of the motion. The opposition must set forth all relevant facts and must contain a

1 legal memorandum. An opposition may be supported by affidavits or declarations that conform to the  
2 provisions of this rule.

3 If you object to the relief requested, you *must* file a **WRITTEN** response to this pleading with the court.  
4 You *must* also serve your written response on the person who sent you this notice.

5 If you do not file a written response with the court, or if you do not serve your written response on the  
6 person who sent you this notice, then:

- 7 ☐ The court may *refuse to allow you to speak* at the scheduled hearing; and  
8 ☐ The court may *rule against you* without formally calling the matter at the hearing

9  
10 DATED: 8/5/10

11  
12 WILDE & ASSOCIATES  
13 By Michael L. Wilde #10099  
14 **GREGORY L. WILDE, ESQ.**  
15 Attorney for Secured Creditor  
16 212 South Jones Boulevard  
17 Las Vegas, Nevada 89107  
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8 Wells Fargo Bank, N.A.  
9 09-70384

10 **UNITED STATES BANKRUPTCY COURT**  
11 **DISTRICT OF NEVADA**

12 In Re:

13 Paul David Bowers and Mary Diane Bowers

14 Debtor(s).

Bk Case Number: 09-50014-gwz

Date: 9/10/2010

Time: 1:30 pm

Chapter 13

15 **CERTIFICATE OF MAILING OF NOTICE AND**  
16 **MOTION FOR RELIEF FROM AUTOMATIC STAY**

17 1. On 8/5/2010 I served the following documents(s):

18 NOTICE AND MOTION FOR RELIEF FROM AUTOMATIC STAY

19 2. I served the above-named document(s) by the following means to the persons as listed below:

20 X a. ECF System

21 Steven A. Alpert  
22 alpert@pricelawgroup.com  
23 Attorney for Debtors

24 William Van Meter  
25 c13ecf@nvcbell.net Trustee

26 X b. United States mail, postage fully prepaid:

Steven A. Alpert  
420 S. Jones Blvd

1 Las Vegas, NV 89107  
2 Attorney for Debtors

3 GE Money Bank  
4 c/o Recovery Management Systems Corp.  
5 Attn: Managing Agent  
6 25 SE 2nd Avenue, Suite 1120  
7 Miami, FL 33131-1605

8 Paul David Bowers and Mary Diane Bowers  
9 820 Glen Vista Drive  
10 Sparks , NV 89434  
11 Debtors

12 ☐ **c. Personal Service** (List persons and addresses. Attach additional paper if necessary)

13 I personally delivered the document(s) to the persons at these addresses:

14 ☐ 1. For a party represented by an attorney, delivery was made by handing the  
15 document(s) to the attorney's office with a clerk or other person in charge, or if no one is charge by  
16 leaving the document(s) in a conspicuous place in the office. N/A

17 ☐ 2. For a party, delivery was made by handing the document(s) to the party or by  
18 leaving the document(s) at the person's dwelling house or usual place of abode with someone of suitable  
19 age and discretion residing there. N/A

20 ☐ **d. By direct mail (as opposed to through the ECF System)**

21 Based upon the written assignment of the parties to accept service by email or a court order. I  
22 caused the document(s) to be sent to the persons at the mail addresses listed below. I did not receive,  
23 within a reasonable time after the transmission, any electronic message or other indication that the  
24 transmission was unsuccessful.

25 ☐ **e. By fax transmission**  
26

1 Based upon the written assignment of the parties to accept service by fax transmission or a court  
2 order. I faxed the document(s) to the persons at the fax numbers listed below. No error was reported by  
3 the fax machine that I used. A copy of the record of the fax transmission is attached.

4 ☐ **f. By messenger**

5 I served the document(s) by placing them in an envelope or package addressed to the persons at  
6 the addresses listed below and providing them to a messenger for service.

7 **I declare under penalty of perjury that the foregoing is true and correct.**

8  
9 Signed on : 8/5/10 By: Janice Miller  
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